

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA,

-against-

Case No. 10-CR-437 (SRC)

LEONID ZALTSBERG,

ORDER

Defendant.

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AN APPLICATION HAVING BEEN MADE TO THIS COURT BY DEFENDANT LEONID ZALTSBERG, for permission for him to extend by 30 days the period of his approved travel internationally in Europe, and Government attorneys Michael C. Vasiliadis, Esq., and AUSA Scott McBride, and United States Probation Officer Kevin Villa, having no objection to said application and agreeing to the entry of the proposed order,

IT IS HEREBY ORDERED, that defendant is granted immediate permission to extend the period of his travel outside of the United States for a 30-day period from August 15, 2012 to September 15, 2012.

IT IS FURTHER ORDERED, that defendant shall provide his Probation Officer with an itinerary of his extended travel, and said itinerary shall be subject to the approval of the Probation Officer.

Dated: August 17, 2012


Steven R. Kartagener, Esq.
Counsel for Defendant


Michael C. Vasiliadis, Esq.
Counsel for the Government


United States District Judge

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Dated: August ____, 2012



Steven R. Kartagener, Esq.
Counsel for Defendant

Michael C. Vasiliadis, Esq.
Counsel for the Government

United States District Judge

STEVEN R. KARTAGENER

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August 15, 2012

Hon. Stanley R. Chesler
United States District Judge
Frank R. Lautenberg U.S. Post Office
& Courthouse, Federal Square
PO Box 999
Newark, NJ 07102

RE: United States v. Leonid Zaltsberg
Dkt. No. 10-Cr.-437 (SRC)

Dear Judge Chesler:

The purpose of this letter is to request respectfully that you approve, without opposition from any of the interested parties, the application of my client, Leonid Zaltsberg, (hereinafter "defendant") for him to be allowed to continue his international travel in Europe, for an additional 30-day period, from August 15, 2012 to September 15, 2012.¹ As you may recall, in May, 2012, you granted defendant permission to travel internationally, in Europe, for an additional 90-day period, from May 15, 2012 to August 15, 2012, following his completion of an earlier, 60-day period of international travel. At the time, the Court indicated, in conversations that it had with counsel while we were working out the terms of defendant's travel, that it would be more inclined to grant such future periods of international travel if defendant made some fruitful efforts to begin paying down his outstanding FBAR penalty. Defense counsel had informed the Court that it would be more likely that defendant would be able to raise such funds if he was free to travel in Europe with the Ukrainian soccer team with which defendant was so closely affiliated.

In accordance with your earlier order, defendant traveled in Europe with his professional soccer team from January 9, 2012 to March 6, 2012. Upon returning to the United States, defendant

¹I apologize for the last-moment nature of this request. I had worked out the particulars of this application with the Government last week, and prepared this letter at that time. However, I inadvertently failed to submit the letter and the proposed order to the Court because of the fact that we were extremely busy with other erupting litigation matters that consumed our time, and caused me to overlook the earlier submission of this letter.

Hon. Stanley R. Chesler
United States District Judge
August 15, 2012
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brought with him \$19,965, which he had earned while traveling and working with his beloved soccer team. Those monies were initially placed in my Attorney IOLA account, awaiting directions from the Government as to how the money should be forwarded to the IRS. Subsequently, those funds were transferred to Internal Revenue Agent Lynn Imbesi.

Although permitted to seek further travel authorization within a week of his return to the United States in early March, because of the strain of the previous travel and some other personal reasons, defendant initially declined to seek such permission, and he stayed at home in New Jersey, in full compliance with his current probation, until May 15, 2012, when he commenced the present 90-day period of international travel.

During that 90-day period of international travel, from May 15th to August 15th, defendant has raised an additional \$22,000 to be paid to the IRS, which presently sits in my IOLA account, and will soon be transferred to the IRS.

A few weeks ago, defendant's grandson, Leon Beyder received an unsolicited inquiry from the owner of the soccer team with which defendant is affiliated, asking whether there was any way for defendant to be permitted to remain in Europe for an additional 30 days. It is this gentleman, an extremely wealthy man, and others similarly situated, from whom defendant hopes to obtain additional monies to be paid to the IRS, in order to work towards paying down his indebtedness.

I have spoken with IRS Attorney Michael C. Vasiliadis, who, in turn, has discussed this matter with AUSA Kevin McBride and United States Probation Officer Kevin Villa, and at this time all of the relevant parties are not opposed to defendant's request for a final, 30-day extension of his present travel time in Europe.

For these reasons, we respectfully urge the Court to grant defendant's request that he be allowed to travel in Europe with his soccer team from August 15th to September 15th of 2012. Thank you.

Respectfully submitted,


Steven R. Kartagener

cc: Michael C. Vasiliadis, Esq.
AUSA Scott McBride
USPO Kevin Villa